

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

SHAUNA ZIEMER, as Executrix
of the Estate of Darrin E. Ziemer,

Plaintiff

v.

NORFOLK SOUTHERN
RAILWAY COMPANY, CLINTON
TOWNSHIP, GRIFFITH
COMPANY AND ESTATE OF
HOWARD E. MARTIN, JR.

Defendants

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: CIVIL ACTION
: DOCKET NO. 4:16-CV-01001
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**ANSWER OF THE ESTATE OF HOWARD E. MARTIN, JR., TO CLINTON
TOWNSHIP'S CROSSLCLAIM**

1. The answer, affirmative defenses and crossclaim of the Estate of Howard E. Martin, Jr., is incorporated herein by reference.
2. This is a conclusion of law to which no response is required. It is, however, denied that the Estate of Howard E. Martin Jr., is liable to plaintiff or to Clinton Township, in any way.

MITCHELL GALLAGHER, P.C.

BY: /s/ Gary L. Weber
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